

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
Executive Director  
and Attorney-in-Chief

Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

May 15, 2023

**VIA ECF and Email**

The Honorable Richard Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: *United States v. Jaylen Martinez, 22 Cr. 668 (RMB)***

Dear Judge Berman,

I write with the consent of the government and Pretrial Services to respectfully request (1) a modification of Mr. Martinez's bail conditions to remove his ankle monitor, and (2) a 30-day adjournment of Mr. Martinez's status conference, currently scheduled for May 23, 2023. Last week Mr. Martinez was in an accident and sustained an injury to his leg. He is currently hospitalized at St. Barnabas Hospital awaiting surgery. In order to proceed with surgery Mr. Martinez will need to have his ankle monitor removed. Pretrial Services has no objection to a permanent and ongoing removal of the monitor. Mr. Martinez has been under the supervision of Pretrial Services for over five months and has been in full compliance with the mandates set forth by the Court and Pretrial Services.

In light of Mr. Martinez's impending surgery, I am further requesting an adjournment of the status conference to allow Mr. Martinez sufficient time to recover before having to appear in court. I expect that a 30-day adjournment will be sufficient, but I will update the Court about any changes in Mr. Martinez's medical condition.

*This email contains no confidential information and is for the addressee only.*

On consent, bail conditions modified to remove ankle monitor. Conference is adjourned to 6/27/23 at 12:00 noon. Time is excluded pursuant to the Speedy Trial Act for the reasons set forth in this letter.

**SO ORDERED:**  
Date: 5/15/23

*Richard M. Berman*  
Richard M. Berman, U.S.D.J.

Respectfully submitted,

  
\_\_\_\_\_  
Tamara L. Giwa  
Counsel for Jaylen Martinez  
Federal Defenders of New York  
(917) 890-9729